

EXHIBIT 6

MEMO ENDORSED

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 3/9/22

JAMES OWENS, et al.

Plaintiffs,

v.

TALIBAN a/k/a ISLAMIC EMIRATE OF
AFGHANISTAN

Defendant.

Civil Action No. 22-1949

**NOTICE OF *EX PARTE* EMERGENCY MOTION
FOR ORDER OF ATTACHMENT**

PLEASE TAKE NOTICE that Plaintiffs in the above-captioned action hereby move pursuant to Federal Rule of Civil Procedure 64 and New York Civil Practice Law and Rules §§ 6201, 6211, and 6212 for an *ex parte* emergency order authorizing attachment of Defendant's assets in this District held in the name of Da Afghanistan Bank, and all other funds belonging to Defendant in this district, in the amount of \$4,669,011,012.21, plus prejudgment interest. The grounds and reasons for granting this relief have been stated with particularity in the accompanying Memorandum in Support of Plaintiffs' *Ex Parte* Emergency Motion for Order of Attachment, the Declaration of Matthew D. McGill in Support of Plaintiffs' *Ex Parte* Emergency Motion for Order of Attachment, and the accompanying exhibits. Under Local Civil Rule 6.1 and CPLR § 6211, *ex parte* adjudication of this motion is warranted, given difficulties that Plaintiffs will encounter in serving Defendant Taliban a/k/a Islamic Emirate of Afghanistan, and the need for immediate attachment of the assets given the risk of dissipation from other creditors or the United States. A proposed order is submitted herewith.

Dated: March 8, 2022

Respectfully submitted,

Rebecca Monck Ricigiliano
CROWELL & MORING LLP
590 Madison Avenue, 20th Floor
New York, NY 10022
Telephone: (212) 895-4000
Facsimile: (212) 223-4134
rricigiliano@crowell.com

John L. Murino
(*pro hac vice* application forthcoming)
Stuart H. Newberger
(*pro hac vice* application forthcoming)
Emily M. Alban
(*pro hac vice* application forthcoming)
CROWELL & MORING LLP
1001 Pennsylvania Ave. NW
Washington, DC 20004
Telephone: (202) 624-2500
Facsimile: (202) 628-5116

Caragh Glenn Fay
(*pro hac vice* application forthcoming)
Amanda Fox Perry
(*pro hac vice* application forthcoming)
FAY LAW GROUP, P.A.
6205 Executive Boulevard
Rockville, MD 20852
Telephone: (202) 589-1300
Facsimile: (202) 216-0298

/s/ Matthew D. McGill
Matthew D. McGill
Jessica L. Wagner
(*pro hac vice* application forthcoming)
GIBSON, DUNN & CRUTCHER LLP
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036
Telephone: (202) 955-8500
Facsimile: (202) 530-9522
mmcgill@gibsondunn.com

Robert L. Wiegel
Jason W. Myatt
GIBSON, DUNN & CRUTCHER LLP
200 Park Avenue
New York, New York 10166
Telephone: (212) 351-4000
rweigel@gibsondunn.com
jmyatt@gibsondunn.com

Counsel for Plaintiffs

Plaintiffs are directed to appear for a hearing on their emergency motion on **Monday, March 14, 2022, at 2:30 p.m.** in **Courtroom 443**, Thurgood Marshall U.S. Courthouse, 40 Foley Square, New York, NY 10007.

SO ORDERED.


3/9/22

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE